

November 5, 2013

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: Notice of *Ex Parte* Communication  
*Promoting Technological Solutions to Combat*  
*Contraband Wireless Device Use in Correctional Facilities*  
GN Docket No. 13-111

Dear Ms. Dortch:

On November 1, 2013, Casey Joseph, Chief Technology Officer, and the undersigned, of Tecore Networks, met with the following individuals of the Federal Communications Commission: Tim May (PSHSB-P&L), Brian Regan (WTB-OBC), Lloyd Coward (WTB), Zenji Nakazawa (PSHSB-P/LI), Melissa Conway (WTB), Luis Zambrano Ramos (WTB) and Walter Johnston (OET), concerning the above-captioned matter.

The meeting was oral only; Tecore Networks did not distribute any documents to the meeting's attendees. In the meeting, Tecore Networks first expressed its belief that specific guidelines from the Commission will prove to be an invaluable asset to vendors who develop and deploy technological solutions to combat contraband wireless device use.

More specifically, Tecore Networks expressed the following to the attendees:

Standardized Model for Spectrum Leases

Tecore endorsed the adoption of a standardized model for spectrum leases, as beneficial to both vendors and carriers. Such a model would ensure that carriers' mandatory issues are addressed and satisfied, while shortening the negotiation process for projects that both vendor and carrier recognize to be of urgent and compelling need for the public safety. In view of the advance lead-time and expense necessary to properly procure and configure equipment in correctional facilities, a standardized spectrum lease should reassure vendors and the correctional facilities that contract deadlines can reliably be met.

Timeframe for Conclusion of Spectrum Leases – the “Shot Clock”

For the reasons stated above, Tecore also endorsed the adoption of a maximum time period for the conclusion of spectrum leases applicable to a particular correctional facility. So long as carriers can be assured of adequate spectrum leases, and all parties (including the FCC) recognize the impact upon the public safety, there should be a sense of urgency to equitably conclude pre-contractual requirements.

#### Standardized Definition of Managed Access

Tecore endorsed the adoption of a standardized set of baseline criteria in order for a vendor to claim its solution constitutes a Managed Access system. In the current environment, the lack of such criteria can expose carriers and correctional facilities to an unacceptable level of variation in system expectation and performance. Additionally, so that a qualifying Managed Access “definition” will always reflect evolving technology, a standardized definition should also impose upon vendors a rigorous requirement to incorporate the latest in established technological advances.

#### Costs of Various Systems

Tecore urged the commission to recognize that the purported cost advantages of a jamming solution, contemplated by several respondents, is unsubstantiated...especially when measured against the many benefits Managed Access provides to carriers and corrections officers.

#### Standardized Process for Account Termination

The parties discussed varying methods for identifying the true account-holder of a contraband device, and varying pathways for termination of the account once the device is identified. Tecore urged that, if pursued, a uniform process should be adopted so the vendor, the carrier, and the correctional facility can be assured that, no matter the jurisdiction, consistent guidelines exist to initiate the speediest possible termination of contraband accounts.

#### “Passive” Detection Solutions that also Transmit

Tecore urged that detection solutions which also transmit signals should also be subject to the same established spectrum rules as Managed Access providers.

#### FCC Review of Form 608 Applications

FCC is considering immediate processing and approval measures for leases related to managed access systems in correctional facilities. Tecore endorsed that concept, and also urged FCC to publish specific instructions for what constitutes a compliant Form 608, so that minor inconsistencies between carriers’ applications do not result in the return of the Form 608, and therefore a loss of time which immediate processing and approval measures were designed to achieve.

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Rural versus Urban Environments

Finally, Tecore related to the attendees its experience regarding the role played by various factors in determining signal strengths at the outer walls of correctional facilities located in rural environments versus facilities located in urban environments.

Should any questions arise regarding the above, please feel free to contact us at any time.

Respectfully submitted,



Deniz H. Hardy  
Counsel for Tecore Networks